

**IN THE UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF ILLINOIS, EASTERN DIVISION**

COMBINED SELECTION GROUP, LTD.	)	
	)	
Plaintiff,	)	Case No. 23-cv-02312
	)	
v.	)	Hon. John F. Kness
	)	
	)	Magistrate Judge Gabriel A. Fuentes
	)	
IFS NORTH AMERICA, INC.,	)	
	)	
Defendant.	)	

**SUPPLEMENTAL JOINT STATUS REPORT AS OF MARCH 14, 2024**

This Supplemental Joint Status Report is submitted by the parties in compliance with the Court's direction to provide a report as to the status of discovery and any request for a settlement conference with the Court as of March 14, 2024. The Parties have again conferred as required by Rule 26(f), and jointly submit the following discovery report. The parties inform the Court that:

- 1) The parties have mutually provided written discovery responses and have conducted six depositions of anticipated witnesses;
- 2) Two individual proposed deponents, Rick Etskovitz and Zack Bergreen, located in the Philadelphia, Pennsylvania area were contacted on February 22, 2024 by Plaintiff's counsel and were subsequently issued subpoenas for their remote depositions to take place on March 13, 2024.
- 3) To accommodate the schedules of these witnesses, the attorneys and the court reporter involved these previously scheduled depositions will be conducted and concluded by agreement on March 27, 2024;

- 4) The Parties do not intend to retain and, therefore, depose any expert witnesses;
- 5) No further adjustment in the discovery schedule set by the Court is anticipated to be made at this time;
- 6) While the parties remain open to continue to explore and consider the possibility of settlement, at this time the parties are not requesting another settlement conference in which the Court will be asked to participate.

Respectfully submitted,

COMBINED SELECTION  
GROUP, LTD.

/s/ Thomas J. Dillon  
One of the attorneys for the Plaintiff,  
COMBINED SELECTION GROUP LTD.

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IFS NORTH AMERICA, INC.

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